

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the matter of)	
)	
Implementation of Section 621(a)(1) of the Cable)	
Communications Policy Act of 1984 as amended)	MB Docket No. 05-311
by the Cable Television Consumer Protection and)	
Competition Act of 1992)	

**MOTION TO EXTEND THE TIME FOR FILING REPLY COMMENTS
OF THE NATIONAL ASSOCIATION OF TELECOMMUNICATIONS
OFFICERS AND ADVISORS,
THE NATIONAL LEAGUE OF CITIES,
THE NATIONAL ASSOCIATION OF COUNTIES,
THE U.S. CONFERENCE OF MAYORS,
THE ALLIANCE FOR COMMUNITY MEDIA,
AND THE ALLIANCE FOR COMMUNICATIONS DEMOCRACY**

The National Association of Telecommunications Officers and Advisors (“NATOA”), the National League of Cities (“NLC”), the National Association of Counties (“NACO”), the U.S. Conference of Mayors (“USCM”), the Alliance for Community Media (“ACM”), and the Alliance for Communications Democracy (“ACD”), by their attorneys and pursuant to Section 1.46(b) of the Commission’s rules, 47 C.F.R. § 1.46(b), hereby request that the Commission extend the deadline for filing reply comments in the above-captioned proceeding¹ by two weeks, from March 14, 2006, to and including March 28, 2006.

The grounds for the requested extension are as follows:

1. By any and every measure, the volume of comments filed in the opening comment period is exceptional. A search of the Commission’s Electronic Comment Filing

¹ *Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992*, Proposed Rule, 70 Fed Reg. 73973 (Dec. 14, 2005) (“NPRM”).

System as of March 1, 2006, indicates that comments have been filed by 3,991 interested parties and members of the public.

2. Although many of these comments consist of only a few pages, the overall volume of pages for review is nearly 14,000 pages. We note that many of the filings of commenters that criticize local franchising authorities (“LFAs”) and the local cable franchising process typically exceed 50 pages. Moreover, several of those comments also include lengthy appendices or other attachments such as special studies and declarations. Verizon, for example, filed three attachments totaling 81 pages, while its comments themselves totaled 100 pages. Likewise, the Fiber-to-the-Home Council filed 84 pages of attachments, in addition to 77 pages of comments. Similarly, the United States Telecom Association’s comments total 64 pages; AT&T, Inc.’s comments total 84 pages; and BellSouth’s comments total 72 pages, plus 27 pages of attachments.

3. We would submit that, under any circumstances, it would take considerable time merely to review this multitude of comments, let alone analyze those comments and prepare reply comments. Indeed, meaningful review and analysis of the opening comments would take well more than the 30 days currently allowed, and for that reason alone, the extension should be granted. But here there are additional special circumstances that also justify the requested extension.

4. As the Commission is no doubt aware, the nature of the rules proposed in the *NRPM* would directly affect the rights and interests of each LFA and each public, educational and governmental (“PEG”) access center across the nation. These LFAs and PEG centers are, of course, movants’ members. Lacking the resources of many of the industry commenters that have attacked local franchising in their opening comments, movants and their members require more

time to inform their members of the substance of the comments adverse to them that have been filed in this proceeding, and to obtain any needed information and input from movants' many members in preparing reply comments.

5. The requested extension serves the public interest by enabling movants and others who wish to file replies to have adequate time to review and analyze the extensive record of filed comments and to prepare and file appropriately thorough and informative reply comments.

6. The requested extension will not cause any harm or prejudice to the Commission, any interested party, or any member of the general public.

For the foregoing reasons, movants respectfully request that the Commission extend the deadline for filing Reply Comments in the above-captioned proceeding by two weeks, from March 14, 2006, to and including March 28, 2006. This extension of time will serve the public interest by facilitating the preparation of meaningful reply comments. And that, in turn, will furnish the Commission with a more thorough and informative record on which to base its decision in this proceeding.

Respectfully submitted,

/s/

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